




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

JUL 17 2002

SUBJECT: National Remedy Review Board (NRRB)
Recommendations for OW at the Maryland Sand,
Gravel and Stone Superfund Site

FROM: Abraham Ferdas, Director 
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Region 3

TO: Bruce K. Means, Chair
National Remedy Review Board

This memorandum provides Region 3's response to the National Remedy Review Board's (NRRB's) advisory recommendations regarding the proposed cleanup action to address Operable Unit Three at the Maryland Sand, Gravel and Stone Superfund Site. The NRRB's recommendations were provided in a memorandum to me dated May 29, 2002. Please find our responses below.

Recommendation 1 - *The board notes that the region's package and cost estimate do not address fully whether certain RCRA requirements (e.g., Subpart O) would be ARAR for the proposed remedy. As this determination is dependent upon the LTTD unit design, the board recommends that the region pay close attention to this issue as it may affect the implementability and cost of the remedy substantially. The results of this analysis should be presented clearly in the decision documents for the site.*

Response to Recommendation 1 - The Proposed Remedial Action Plan states that the operation of the LTTD unit would comply with Subpart X of RCRA and that compliance with Subpart O may or may not be required, depending on whether or not thermal destruction of hazardous waste would occur. The Proposed Plan specifies that this determination, and the decision regarding the applicability of Subpart O, would be made during the remedial design. The Region believes that the 35 to 40 percent contingency built into the cost estimates for the alternatives which include LTTD is sufficient to cover any additional costs which may be associated with the regulatory requirements of Subpart O. The factors which will determine the applicability of Subpart O will be further discussed in the Record of Decision.

Recommendation 2 - *The region proposes to achieve groundwater cleanup standards in the Upper Sand lithologic unit by enhancing the naturally occurring processes for biodegradation of contaminants through the addition of inorganic nutrients, organic carbon and/or microbial*

cultures to the saturated zone. The board notes that the site contaminants degrade by both aerobic and anaerobic processes. The board recommends that treatability studies be conducted during design to assess the effectiveness of enhanced microbial activity. If significant contaminant degradation is observed, additional studies should be conducted to optimize the performance potential of the proposed biodegradation component of the remedy.

Response to Recommendation 2 - The Region agrees that additional studies would be required in order to optimize conditions for both aerobic and anaerobic biodegradation processes at the Site. For those remedial alternatives which include enhanced biodegradation of ground water contaminants, the Proposed Plan specifies that additional studies would be conducted during the remedial design in order to optimize the performance potential of the biodegradation component of the remedy. The Proposed Plan also includes electron receptors on the list of substances which may be added to the aquifer in order to enhance natural biodegradation, in recognition of the significance of aerobic processes at the Site.

Recommendation 3 - *The site package reports that non-aqueous phase liquid (NAPL) was observed in two locations on the site. The board recommends that during remedy implementation, the region take care to confirm dense NAPL and/or light NAPL locations and remove and/or treat any NAPL to the extent practicable in order to address these potential sources of groundwater contamination and reduce the groundwater restoration timeframe.*

Response to Recommendation 3 - For Alternatives 3a through 5, the Proposed Plan states that any NAPL identified during the design or implementation of the alternative would be recovered, to the extent practicable, for off site treatment or disposal. In addition, the Region increased the estimated cost for each of these alternatives in order to provide for sampling to identify NAPL and other source material.

Recommendation 4 - *The board notes that the State of Maryland did not participate in the meeting or submit comments to the board in support of its deliberations. Input from the state would have been helpful to the board in reviewing the region's cleanup proposal.*

Response to Recommendation 4 - The State of Maryland was invited to submit comments to the NRRB but chose not to do so. Based on our dialogue with the State and comments received from the State on the final draft Proposed Plan, we believe that Maryland is in agreement with EPA's preferred remedial alternative.

We appreciate the Board's comments regarding the Maryland Sand, Gravel and Stone Site and hope that our responses fully address the NRRB's recommendations. If you have any future questions concerning this Site, please feel free to contact Peter Ludzia, Chief of the General Remedial Section, at (215) 814-3224 or Debra Rossi, Remedial Project Manager, at (215) 814-3228.